To: FCC From: Patricia Burke Date: April 6, 2025 Re: 25-133 Delete, Delete, Delete

The FCC asked: *"Are there existing rules that could give rise to a risk of regulatory capture?"*

“We also invite more general comment on rules that should be considered for elimination on other grounds.”

This public comment includes justification for” eliminations” on the basis of other grounds, including Smart Meter Harm and Disability, Captured Agencies, Conducted Emissions, Juxtaposed Exposures, Chronic Exposures, Outdated Science, Institutionalized Discrimination, EMR-S, and a historical record of ignoring Human Health, Human Rights, Community Rights, and the Environment.

The FCC was created, "for the purpose of the national defense”

The 2008 Federal Communications Commission Fiscal Year 2008 Performance and Accountability Report states,

“Furthermore, the Act provides that ***the FCC was created, "for the purpose of the national defense,"*** *and,* ***"for the purpose of promoting safety of life and property*** *through the use of wire and radio communications."[4] As specified in Section 1 of the Communications Act of 1934 and amended by the Telecommunications Act of 1996 (amendment to 47 U.S.C. §151), the mandate of the FCC is, "to make available so far as possible, to all the people of the United States, without discrimination on the basis of race, color, religion, national origin, or sex, rapid, efficient, nationwide, and world-wide wire and radio communication services with adequate facilities at reasonable charges."* SOURCE

The 2008 report also notes:

> As I have said in the past, it is important that the Commission run a tight fiscal ship and adhere to strong accounting and financial management practices and procedures. The investments we have made to improve the Commission's financial management continue to pay off. As a result, I am pleased to announce that, for the third straight year, the Commission has received an unqualified audit opinion. The independent auditor's opinion addresses more than $400 million in operating expenses, over $8 billion in program costs for the Universal Service Fund, Telecommunications Relay Service Fund, and North American Numbering Plan, and over $19 billion in revenue gained from the auction of spectrum in FY 2008. In this year's report, we have also enhanced the Commission's financial disclosures by providing additional information about the Commission's operations, including its financial operations and contracting actions.

https://transition.fcc.gov/Reports/ar2008.pdf

The FCC's operating budget for 2024 is $12,686,000, reflecting a $555,000 increase over the FY 2023 enacted level. - SOURCE

None of this money has been devoted to creating an appropriate balance between the protection of emerging issues of health, human rights, community rights, and the protection of nature, relative to the objectives of the military-industrial complex.

One Agency Wearing Too Many Hats (vs. Tin Foil Hats)

Despite the exorbitant budget, one agency cannot focus on national defense and the promotion of radar-based and wireless military technologies and surveillance, and also protect human health and the environment and disability rights, when it is staffed and captured by the industry it is charged with regulating, with no oversight, accountability, or expertise regarding the protection of health and the environment.

There is no appropriate safety science and/or safety testing supporting wireless and power-line technologies, despite decades of reported harm to human health.

The FCC has overseen the overriding priority of growth of a surveillance state and the expansion of certain segments of the economy (for example, cellular phones with ready-made surveillance capabilities, and and enabling the adoption of dual-use technologies like utility meters installed under the guise of energy efficiency that are neither safe nor secure, to appeal to the core values of sustainability interests)

The agency is an embodiment of a nation that has turned inward on its own people, offensively. Both political parties are culpable.

The FCC, as an umbrella organization serving competing interests and ignoring mounting issues, is shifting the burdens to future generations to address stranded assets, and the profound health and environmental costs of not addressing late lessons from early warnings.

The FCC should be deleted.

The FCC itself is a captured agency.

"Captured Agency: How the Federal Communications Commission Is Dominated by the Industries It Presumably Regulates," 2015

https://www.propublica.org/article/fcc-5g-wireless-safety-cellphones-risk.

https://www.propublica.org/article/fcc-environment-cell-towers-failures

The FCC: A defacto lobbying arm for the military, wireless, telecom, and utility industries and their partners

The FCC, as a politically compromised and captured agency, has been the driving force behind the lack of regulation of increasing juxtapositions of EMF/RF exposures that, in fact, induce disability and neurological damage.

The agency functions as a defacto lobbying arm for the military, wireless, telecom, and utility industries and their partners.

Most Americans are unaware that the FCC is the embodiment of the military–industrial complex that Eisenhower warned about.

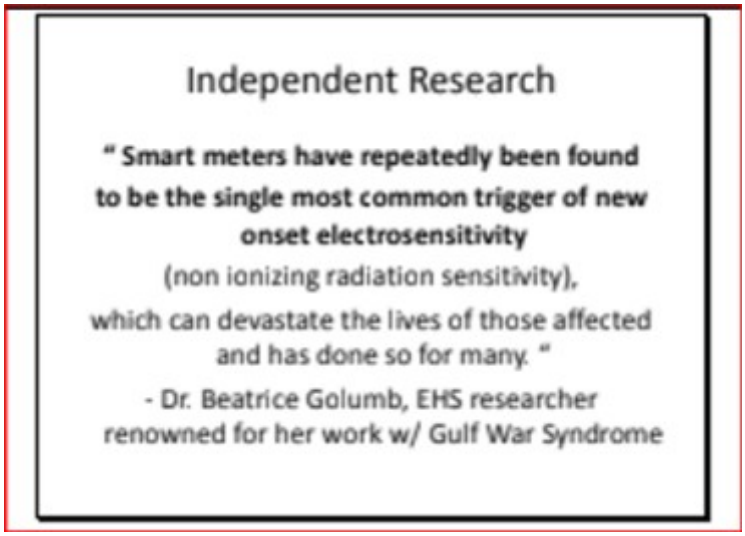
“As President of the United States for two terms, Eisenhower had slowed the push for increased defense spending despite pressure to build more military equipment during the Cold War’s arms race. Nonetheless, the American military services and the defense industry had expanded a great deal in the 1950s. Eisenhower thought this growth was needed to counter the Soviet Union, but it confounded him. Though he did not say so explicitly, his standing as a military leader helped give him the credibility to stand up to the pressures of this new, powerful interest group. He eventually described it as a necessary evil.

A vital element in keeping the peace is our military establishment. Our arms must be mighty, ready for instant action, so that no potential aggressor may be tempted to risk his own destruction. . . . American makers of plowshares could, with time and as required, make swords as well. But now we can no longer risk emergency improvisation of national defense; we have been compelled to create a permanent armaments industry of vast proportions. . . . This conjunction of an immense military establishment and a large arms industry is new in the American experience. . . .Yet we must not fail to comprehend its grave implications. . . . In the councils of government, we must guard against the acquisition of unwarranted influence, whether sought or unsought, by the military-industrial complex. The potential for the disastrous rise of misplaced power exists and will persist.”

The FCC represents “the acquisition of unwarranted influence, whether sought or unsought, by the military-industrial complex.”

FCC: Enabling the Direct Cause of Disability to a Portion of the Population

The FCC has not only failed to recognize and address accommodation demands for those who are more sensitized to an electromagnetically-polluted environment, (and in particular those who experienced direct harm as the result of utility meter installations in the last decade).


Independent Research
" Smart meters have repeatedly been found to be the single most common trigger of new onset electrosensitivity
(non ionizing radiation sensitivity),
which can devastate the lives of those affected and has done so for many. "
- Dr. Beatrice Golumb, EHS researcher renowned for her work w/ Gulf War Syndrome

The FCC is responsible for sustaining the regulatory environment that enables the manufacture and sale of unsafe infrastructure and devices affecting the health and the human rights of consumers across all age groups.

The FCC should be deleted entirely and replaced by separate agencies within a functional system of checks and balances, comprised of independent scientists and policy makers who can move innovation back into alignment with the protection of democracy, human health, and the environment.

Data Collection for Health and Environmental Harm Should be Shifted to Another Agency

In particular, the responsibility for collecting reports of harm, especially from the imposition of inescapable ambient infrastructure (including cell towers and utility meters introducing invasive exposures beyond the control of the consumer) must be moved to a different regulatory agency with the responsibility for providing accurate data.

The prevailing practice of ridicule, minimization, suppression, and outdated theoretic constructs not supported by real world experience must be replaced by scrutiny concerning the data that supports the conclusion that RF/EMF exposures are a driver of chronic illness and disease.

Reports of harm caused by EMF/RF exposures should immediately be added to list of statistics for conditions that each state and local health agency collects.

The FCC’s stance on safety has been weaponized against the public by inadequately informed local and state decision makers who do not understand the level of corruption of the science, or who are themselves making corrupted decisions.

Communities, decision-makers and courts are mandated to defer to the FCC, which functions as a functional vacuum regarding protection for health and the environment.

Health harm caused by man-made artificial EMF/RF exposures has a long history

Date	Name
1746	Martyr of Electricity
1871	Electro-Sensibility (ES)
1885	Hypo-Electrosia / Hyper-Electrosia
1885	Magneto-sensitivity
1889	Telephone Tinnitus
1932	Radio Wave Sickness
1953	Mild Radiation Poisoning
1964	Microwave Syndrome (MWS)
1976	Diplomats' Disease
1986	Electrical Sensitivities (ES)
1989	Electrical Hypersensitivity
1991	Electromagnetic Sensitivity
1994	Electromagnetic Hypersensitivity (EHS)
2000	El-Allergy (EA)
2008	EMF Intolerance Syndrome
2013	Rapid Aging Syndrome
2017	Havana Syndrome
2024	Electromagnetic Radiation Syndrome (EMR-S)
2025	Electromagnetic Fields: Biological Effects (EMF: BE)
2025	Electromagnetic Fields Syndrome (EMF-S) (a subset of EMF: BE)

Table 2. A selection of twenty names for EHS over the last three centuries

SOURCE: Defining Electromagnetic Hypersensitivity (EHS) Michael Bevington, Chair of Trustees at Electrosensitivity UK, examines the history of Electromagnetic Hypersensitivity (EHS) over the past 275 years, highlighting key 18th-century discoveries and early reports of health issues related to electromagnetic fields (EMFs) https://www.openaccessgovernment.org/article/defining-electromagnetic-hypersensitivity-ehs/190968/

(Missing are the terms tin foil hat, nocebo, wacko, paranoid, mentally ill, and other depictions of sensitized populations widely in use in the public domain.)

Symptoms, before 1800	Near 5G masts, 2023-2024
Dizziness	Dizziness
Nausea	Nausea
Headaches	Headache
Nervousness	Emotional
Irritability	Irritability
Mental confusion	Confusion
Depression	Depression
Insomnia	Insomnia
Fatigue	Fatigue
Numbness, tingling	Dysesthesia
Muscle pains, cramps	Arthralgia, Myalgia
Heart Palpitations	Irregular heart pulse
Diarrhoea	Diarrhoea
Nosebleeds	Nose bleeding
Itching	Skin: face, arms, legs
Shortness of breath	Dyspnoea
Coughing	Cough
Wheezing, asthma attacks	Chest squeeze
Eye pain, weakness	Ocular deficiency
Ringing in the ears	Tinnitus

Table 1. Twenty conscious EHS symptoms were listed by 1800 and again in 2023-24 from 5G

SOURCE: Defining Electromagnetic Hypersensitivity (EHS) Michael Bevington, Chair of Trustees at Electrosensitivity UK, examines the history of Electromagnetic Hypersensitivity (EHS) over the past 275 years, highlighting key 18th-century discoveries and early reports of health issues related to electromagnetic fields (EMFs) https://www.openaccessgovernment.org/article/defining-electromagnetic-hypersensitivity-ehs/190968/

Threats to the Utility Grid are Threats to Public Safety,

Mercenary Science Threatens Public Health and Safety

The fact that the compromised testimony of mercenary scientists was allowed to prevail concerning the safety of modifications to the nation's utility grid necessitates immediate investigation to prevent further risk and harm to the electricity supply, especially concerning the introduction of high voltage transients onto household wiring and radiating into occupied living space, and lack of adequate surge protection, for example from an EMP or solar flare.

Transients that have been introduced to the grid (dirty electricity) are another source of injury manifested in connection with the "smart" grid.

See: ICNIRP GUIDELINES FOR LIMITING EXPOSURE TO TIME-VARYING ELECTRIC AND MAGNETIC FIELDS (1 HZ – 100 kHZ)
https://icnirp.org/cms/upload/publications/ICNIRPLFgdl.pdf

See: ICNIRP STATEMENT GAPS IN KNOWLEDGE RELEVANT TO THE "ICNIRP GUIDELINES FOR LIMITING EXPOSURE TO TIME VARYING ELECTRIC, MAGNETIC AND ELECTROMAGNETIC FIELDS (100 KHZ TO 300 GHZ)"
https://www.icnirp.org/cms/upload/publications/ICNIRPrfgaps2025.pdf

See: ICNIRP: Fact Sheet on the Guidelines for Limiting Exposure to Time Varying Electric and Magnetic Fields (1 Kz to 100 kHz) Published in Health Phys 99(6): 818-836; 2010 Appendix F-1 ICNIRP Guidelines Fact Sheet 2010 (4 pgs.)
https://www.icnirp.org/cms/upload/publications/ICNIRPFactSheetLF.pdf

Compromised, Corrupted Expertise

National electricity policy and decision-making should never have been allowed to proceed on the basis of mercenary tobacco science.

Here is the science that was promoted to and by the NCSL National Council of State Legislatures regarding smart meters, provided by literal tobacco industry expert witnesses:

Emerging Issues
Mike Oldak
VP Strategic Initiatives & General Counsel
Utilities Telecom Council
NCSL 2012 Energy Policy Summit
Smart Meter Safety
Expert Testimony
Dr. Valberg, testifying before the Maryland PSC stated
IARC has not found any "...adverse health consequences established from exposure to RF fields at levels below the international guidelines on exposure limits published by the International Commission on Non-Ionizing Radiation Protection.
Dr. Yakov Shkolnikov and Dr. William H. Bailey testifying before the Public Utility Commission of Nevada

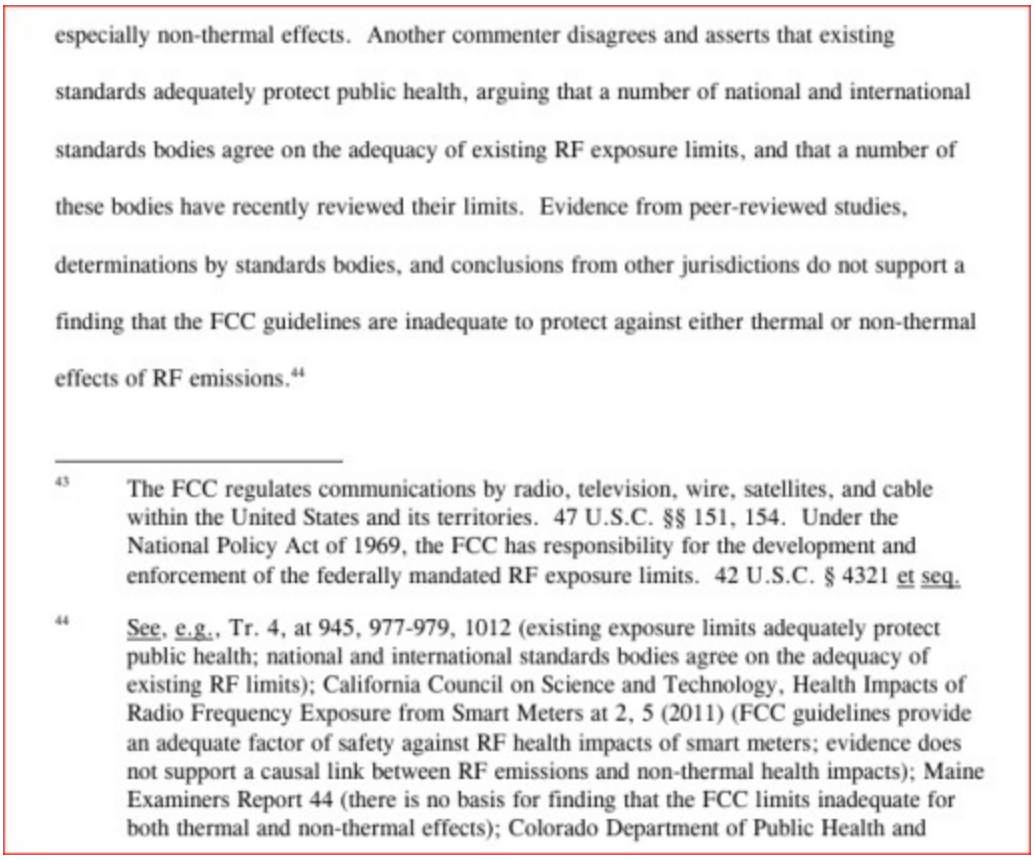
(no longer available to the public online)

The Massachusetts utility regulator went as far as to issue an order 12-76-B that included the claim that

" Evidence from peer-reviewed studies, determinations by standards bodies, and conclusions from other jurisdictions ***do not support a finding that the FCC guidelines are inadequate to protect against either thermal or non-thermal effects of RF emissions.****44"*

This claim even goes beyond the misrepresentations of the FCC's current scientific paradigm.

It is unfathomable that an error of this magnitude prevailed at the level of a states' utility regulation, reflecting either incompetence or corruption.



especially non-thermal effects. Another commenter disagrees and asserts that existing standards adequately protect public health, arguing that a number of national and international standards bodies agree on the adequacy of existing RF exposure limits, and that a number of these bodies have recently reviewed their limits. Evidence from peer-reviewed studies, determinations by standards bodies, and conclusions from other jurisdictions do not support a finding that the FCC guidelines are inadequate to protect against either thermal or non-thermal effects of RF emissions.[44]

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[43] The FCC regulates communications by radio, television, wire, satellites, and cable within the United States and its territories. 47 U.S.C. §§ 151, 154. Under the National Policy Act of 1969, the FCC has responsibility for the development and enforcement of the federally mandated RF exposure limits. 42 U.S.C. § 4321 et seq.

[44] See, e.g., Tr. 4, at 945, 977-979, 1012 (existing exposure limits adequately protect public health; national and international standards bodies agree on the adequacy of existing RF limits); California Council on Science and Technology, Health Impacts of Radio Frequency Exposure from Smart Meters at 2, 5 (2011) (FCC guidelines provide an adequate factor of safety against RF health impacts of smart meters; evidence does not support a causal link between RF emissions and non-thermal health impacts); Maine Examiners Report 44 (there is no basis for finding that the FCC limits inadequate for both thermal and non-thermal effects); Colorado Department of Public Health and

https://fileservice.eea.comacloud.net/FileService.Api/file/fileroom//9235208

Neither the NCSL or the MA DPU responded when the issue of compromised expertise was brought to their attention, nor did utility regulators in many other states and jurisdictions.

The FCC cast a blind eye.

Unsafe Smart Meter Installations Should Be “Deleted”

One immediate course correction that the United States could implement is to stop installing transmitting electric utility meters on the homes of low usage consumers, as Germany has done.

Citizen research has quantified the fact that "current smart grid billing schemes are creating a disparity among ratepayers" and "Consumers with lower levels of energy consumption are subsidizing customers with higher consumption."

The FCC enabled the charade of smart metering to extend across the country, despite over a decade of reported issues, including green-washing, security, cost, safety, hack-ability, privacy, and fires.

The FCC was complicit in the short-sighted and wasteful installation of wireless “smart” meters on homes that will not benefit from time-of-use billing schemes and that do not have an electric vehicle, central air, swimming pool, or hot tub.

The ineffective grid technologies and related surcharges are making utility rates skyrocket.

The FCC has allowed the health harm to prevail because the purpose of the grid is surveillance, and the added value of the sale of personal data collected.

Commenting on this privacy violating information generated from “smart” meters, Miles Keogh, director of grants and research at NARUC, was quoted in a 2015 Politico article as saying, “I think the data is going to be worth a lot more than the commodity that’s being consumed to generate the data.”

An additional immediate course correction is necessary: to remove the transmitting meters from homes in need of relief in order to protect health and human rights, as the science is re-examined in light of reported harm and the science that verifies non-thermal effects of non-ionizing radiation.

Meters of neighboring premises, especially in multi-family housing, would also need to be removed if they negatively impact another’s health.

Through its inaction as the responsible party, the FCC is enabling the equivalent of continuing to promote asbestos, despite known harm and rising future costs.

March 1976: Biological Effects of Electromagnetic Radiation (Radiowaves and Microwaves) Eurasian Communist Countries reported in 1976 by the Defense Intelligence Agency

The nation veered very far off track in 1976 by ignoring international scientific findings about non-ionizing radiation.

“This is a Department of Defense Intelligence Document prepared by the US Army medical Intelligence and Information Agency and approved by the Directorate for Scientific and Technical Intelligence of the Defense Agency.

If the more advanced nations of the West are strict in the enforcement of stringent exposure standards, there could be unfavorable effects on industrial output and military functions. The Eurasian Communist countries could, on the other hand, give lip service to strict standards, but allow their military to operate without restriction and thereby gain the advantage in electronic warfare techniques and the development of antipersonnel applications.

The potential for the development of a member of antipersonnel applications is suggested by the research published in the USSR, East Europe, and the West. Sounds and possibly even words which appear to be originating intracranially can be induced by signal modulation at very low average-power densities.

Combinations of frequencies and other signal characteristics to produce other neurological effects may be feasible in several years. The possibility of inducing metabolic diseases is also suggested. Animal experiments reported in the open literature have demonstrated the use of low-level microwave signals to produce death by heart seizure or by neurological pathologies resulting from breaching of the blood-brain barrier.

(U) As may be expected, the bulk of the research being done in this area is in the USSR. However, a notable volume is also being produced by Poland, Czechoslovakia, Bulgaria, Rumania, and Hungary.

Read and download the full 34-page military report here: DIA Report-1976.

Although the U.S. military dismissed the Russian/Earasian Research in 1975, they had already made mention of both risks to the heart, and damage to the blood brain barrier, which mirror current civilian complaints and recent research findings.

The FCC, rather than requiring an appropriate level of research on non-thermal effects, has blocked the evolution of the science and the innovations that would have followed that could have made the country an international leader in safety.

By adopting the false premise that the thermal threshold is the only mechanism of harm, they have lied to the public and violated the public trust.

The FCC and other agencies should have conducted appropriate research, especially in regard to non-thermal effects of non-ionizing radiation exposures on children and vulnerable populations, long before consumer devices (cell phones) and involuntary uncontrolled exposures (cell towers, smart meters) exposing non-

consenting, non-benefitting individuals were introduced into the marketplace, or imposed in connection with access to essential services including electricity and water via the smart gird.

Every cost-benefit analysis justified by ignoring the health and environmental costs of exposures regulated by the FCC is incomplete and invalid, with the costs currently being outsourced to the social sector, including health care for mounting chronic illnesses and disease.

See the paper here by Camilla Rees and Richard Leer: https://electromagnetichealth.org/electromagnetic-health-blog/safety-of-wireless-technologies-the-scientific-view/)

The Demand for a Financial Audit: America's households and businesses have been charged at least nine times for broadband/fiber optic services

"The IRREGULATORS is an independent, consortium of senior telecom experts, analysts, forensic auditors, and lawyers who are former senior staffers from the FCC, state advocate and Attorneys General Office experts and lawyers, as well as former telco consultants. America's households and businesses have been charged at least nine times for broadband/fiber optic services, including the wiring of schools, libraries, and hospitals — about $4000-$7000 per household, and the total is way over ½ trillion dollars by 2016. You can thank just a few companies: AT&T, Verizon and Centurylink, who control the state-based utilities, along with the cable companies, Comcast and now-Spectrum et al. And this is the low number. More importantly, Verizon, AT&T and CenturyLink control the state telecommunications utilities, such as Verizon NY or AT&T-California, a fact that has been erased. And the copper wires, as well as most of the fiber optic wires, are part of these state utilities, including those used for FiOS or the wires to the cell sites, or all of the other 'business data services'"

Lack of research and guidance about personal consumer devices (laptops) has resulted in school systems using taxpayer's monies to invest in technology (and endless cycles of software upgrades for security). Many technology choices are causing direct harm to children's physical, mental, and emotional health, far in excess of the dangers posed by social media, from posture to eyesight to lack of sleep to healthy brain functioning to missing developmental milestones to RF-related symptoms being misrepresented as "stress."

Health: The Cities of Boston and Philadelphia Reference to the 1999-2000 Judicial Review That Was Never Resolved: ADA vs FCC

The cities of Boston and Philadelphia in their joint submission to the FCC on November 18 accused the FCC and Federal health agencies of negligence for failing to investigate whether electrosensitive persons are harmed by cell phone radiation, dating back to 1999.

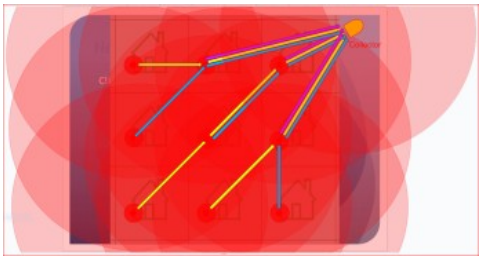
"The FCC admits its own lack of expertise in the field. But the overlap of federal agency responsibilities for RF radiation protection and the merely advisory status of the Radiofrequency Interagency Work Group often leaves leadership unclear and encourages a pass-the-buck attitude ...

The 1999-2000 judicial challenge to the FCC's 1996 rules never reached the issue of "electrosensitivity" as a cognizable disability under the Americans with Disabilities Act. ("ADA") Here again, an agency responsible for ADA implementation acknowledges that the impairment may be disabling but has promised merely further inquiry. After more than a decade, that investigation remains unopened. The dockets here have been updated with massive additional evidence of the crippling effects of RF radiation on an admitted minority – but a suffering minority – of U.S. citizens. The FCC and its sister regulatory agencies share responsibility for adherence to the ADA and should replace promises with serious attention to a serious medical problem. This is one area where the FCC could lead in advice to electrosensitive persons about prudent avoidance."

ET Docket No. 13-84 and ET Docket No. 03-137
https://www.fcc.gov/ecfs/document/6017477376/1

The FCC has systematically ignored the reports of harm, for decades,that should have informed proactive decision-making and policy-making.

The FCC misled communities across the country in regard to the safety of infrastructure proximal to homes and businesses resulting in the choice of harmful densification of 5G antennas and wireless meters, instead of safer, more secure hard-wired alternatives.



Health: 2008 The National Academies: Identification of Research Needs Relating to Potential Biological or Adverse Health Effects of Wireless Communication Devices

The U.S. Food and Drug Administration asked the National Research Council to organize a workshop to identify research needs and gaps in knowledge in the areas of dosimetry and exposure, epidemiology, human laboratory studies, mechanisms, and animal and cell biology. The workshop did not include the evaluation of health effects or the generation of recommendations relating to how identified research needs should be met. Some needs and gaps identified at the workshop include: (1) characterization of exposures from wireless devices and RF base station antennas in juveniles, children, fetuses, and pregnant women and (2) evaluation of devices that use newer technologies (e.g., texting, web-surfing).

Janet Newton of the EMR Policy Institute provided this information to the MA Department of Public Utilities in her testimony in March of 2014 for MA D.P.U. docket 12-76:

"The task of the 2008 National Academy of Sciences (NAS) Report, Identification of Research Needs Relating to Adverse Health Effects of Wireless Communication, was to identify any inadequacies in the research upon which the current US Radiofrequency radiation (RF) safety guidelines are based.

The NAS Report did indeed find numerous inadequacies in that research record. An inadequate research record results in safety regulations that fail to address all exposures encountered by the public. Based on the 2008 NAS findings it cannot be asserted that US RF safety policy protects all members of the public from all mechanisms of harm in all exposure scenarios."

Health: NAS, The Safety Research Record is Inadequate

FCC guidelines have no basis for the assumption that products and infrastructure are safe for

1) Exposure of juveniles, children, pregnant women, and fetuses both for personal wireless devices (e.g., cell phones, wireless personal computers [PCs] and for RF fields from base station antennas.)

2) Variability of exposures to the actual use of the device, the environment in which it is used, and exposures from other sources.

3) Multilateral exposures.

4) Multiple frequency exposures.

5) Exposure to pulsed radiofrequency radiation.

6) Location of use (both geographic location and whether a device is primarily used indoors or outdoors).

7) Models for men and women of various heights and for children of various ages.

8) Exposure to others sources of RF radiation such as cordless phones, wireless computer communications, and other communications systems.

9) Exposure to the eyes, hand or the human lap or parts of the body close to the device.

10) RF exposure in close proximity to metallic adornments and implanted medical devices (IMDs) including metal rim glasses, earrings, and various prostheses (e.g., hearing aids, cochlear implants, cardiac pacemakers, insulin pumps, Deep Brain Stimulators).

11) Sufficiently long exposure and follow-up to allow for detection of effects that occur with a latency of several years.

12) Lack of information concerning the health effects associated with living in close proximity to base stations

13) Research that includes children, the elderly, and people with underlying diseases.

14) Research on possible adverse RF effects identified by changes in EEG (electroencephalogram) activity.

– not a complete list.

Consumers Believe That Safety Regulation is in Effect

Consumers look at the FCC ID number on a device and believe that an agency that has their interests at heart has actually safety tested the computer, Ipad, cell phone, ear bud, Wi-FI, 5G, or wearable with the best science available, placing their trust in technology, the regulatory agency, the industry, and the government.

Most consumers have no idea that the FCC (and the industry) has repeatedly ruled in favor of reckless policy –making and has done nothing to evolve the science in order to address current exposures, still relying on its theoretical guidelines from 1996.

Inadequate Modeling and Testing

When drugs were tested on male military recruits and then prescribed to women and children, the misguided science killed people.

The wireless industry has taken the cognitive error even further by testing cell phones for 6 minutes by taking the core temperature of an inanimate dummy that represents the dimensions of a male military recruit’s head, filled with the equivalent of Jello to represent “average tissue” – a ridiculous assumption,

especially with what is known about glioblastomas and other forms of brain cancer. See https://www.wearenotsam.com/

As just one example of overlooked scientific research implications see this study from 2006. Role of blood flow on RF exposure induced skin temperature elevations in rabbit ears Our results demonstrate that the physiological effects of blood flow should be considered when extrapolating modeling data to living animals, and **particular caution is needed when interpreting the results of modeling studies that do not include blood flow**. Bioelectromagnetics 28:163–172, 2007. © 2006 Wiley-Liss, Inc.

In February of 2025, researchers at the Environmental Health Trust announced, Ultrasound Study Reveals Wireless Radiation Can Cause Blood Cells to Stick Together. Discovery Poses Significant Implications for Public Health. A ground-breaking study commissioned by Environmental Health Trust (EHT) reveals a startling discovery about the effect of cell phone radiation on human blood. Using diagnostic ultrasound, researchers have documented that exposure to an active cell phone can cause red blood cells to clump together, forming aggregates large enough to be visible on imaging. This phenomenon, known as "rouleaux formation," has significant implications for public health. The findings, discovered by EHT Vice President for Scientific Research and Clinical Affairs Dr. Robert Brown and his colleague Barbara Biebrich, a senior ultrasound technologist with decades of experience performing vascular ultrasounds, were published Tuesday in the scientific journal, Frontiers in Cardiovascular Medicine. Unlike previous studies relying on the controversial technique of live blood cell analysis in vitro, or samples placed on microscope slides, this study was done in vivo using ultrasonography, a widely available and reliable diagnostic tool routinely used for the evaluation of blood vessels.

"Our findings make it clear that, at least in some people, cell phone radiation can lead to observable changes in blood, with potential risks such as reduced oxygen delivery and an increased risk for developing blood clots," Dr. Brown said.

The study is here.

Had the FCC been conducting appropriate post-market surveillance, this mechanism of harm of rouleaux formation could have been confirmed in 2006, below the thermal threshold, moving the industry to safer alternatives, including emphasizing wired connections, nearly twenty years ago

The 2021 Court Ruling Against the FCC

In 2013, the FCC opened a proceeding seeking comment about its regulations, in anticipation of newer technologies. The FCC made a decision in 2019 to close the docket, and issued its opinion that its exposure guidelines did not need review, while easing regulations to enable more industry growth.

The FCC's conclusions are here. Microsoft Word - FCC-19-126A1

First, we resolve a Notice of Inquiry that sought public input on, among other issues, whether the Commission should amend its existing RF emission exposure limits.2 After reviewing the extensive record submitted in response to that inquiry, we find no appropriate basis for and thus decline to propose amendments to our existing limits at this time.

Second, based on our existing limits, we revise our implementing rules to reflect modern technology and today's uses. We streamline our criteria for determining when a licensee is exempt from our RF exposure evaluation criteria, replacing our prior regime of service-based exemptions with a set of formulas for situations in which the risk of excessive RF exposure is minimal. For those licensees who do not qualify for an exemption, we provide more flexibility for licensees to establish compliance with our RF exposure limits. And we specify methods that RF equipment operators can use to mitigate the risk of excess exposure, both to members of the public and trained workers (such as training, supervision, and signage). (more at link).

The FCC's 2019 decision gave rise to lawsuits which were consolidated into one case.

The United States Court of Appeals for the District of Columbia Circuit judges ruled in favor of environmental health groups and petitioners that challenged the FCC.

"The court held that the FCC failed to respond to "record evidence that exposure to RF radiation at levels below the Commission's current limits may cause negative health effects unrelated to cancer." Further, the agency demonstrated "a complete failure to respond to comments concerning environmental harm caused by RF radiation." The court found the FCC ignored numerous organizations, scientists and medical doctors who called on them to update limits and the court found the FCC failed to address these issues:

impacts of long term wireless exposure

impacts to children,

the testimony of people injured by wireless radiation,

impacts to wildlife and the environment

impacts to the developing brain and reproduction."

The FCC has ignored the court remand.

This should not be an option for an agency with such far-reaching impacts.

The Court Ruling: https://media.cadc.uscourts.gov/opinions/docs/2021/08/20-1025-1910111.pdf (As of this writing, the direct links to testimonies to many of the FCC proceedings and to the court's ruling against the FCC are broken.

As AI scrapes the internet for data, is it possible that these are deliberate attempts to suppress accurate information from being accessible in the public domain?

Conclusion: Delete the FCC in its Current Form

The decision makers and departments at the FCC that have been actively involved in decisions to suppress reports of harm, to defraud the public regarding investments in infrastructure, and to ignore the court's 2021 remand should be removed from positions of responsibility that involve public health.

A counter-balancing consortium should be established comprised of experts representing the various interest groups, in a transparent manner, with health and environmental protection elevated to the highest priority, with a zero tolerance policy towards dishonesty concerning the lack of protection and ensuing harm that has been perpetrated on the public for over 60 years.

(And although the agency should be deleted, all links to the previous FCC proceedings should be restored, in order to prevent history from repeating itself by concentrating too much power in the hands of those controlling the data and the flow of information to the public)

The industry can and will respond to the call for innovation that leads on safety.